

**To:** Kelsi Feltz  
Office of Information and Regulatory Affairs (OIRA)  
Office of Management and Budget (OMB)

**From:** Shannon Herboldsheimer  
Office of Refugee Resettlement (ORR)  
Administration for Children and Families (ACF)

**Date:** June 5, 2024

**Subject:** Non-Substantive Change Request – Administration and Oversight of the Unaccompanied Children Program (OMB #0970-0547)

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This memo requests approval of non-substantive changes to the approved information collection, Administration and Oversight of the Unaccompanied Children Program (OMB #0970-0547).

## **BACKGROUND**

The “Administration and Oversight of the Unaccompanied Children Program” information collection contains 12 instruments that allow the Office of Refugee Resettlement (ORR) to facilitate stakeholder visits to care provider facilities; obtain consent from unaccompanied children to share their case file information; improve service delivery to unaccompanied children; and ensure that serious issues are elevated to ORR and that all incidents and the response to such incidents are documented and resolved in a way that protects the interests of unaccompanied children. The collection was last approved by OMB on May 18, 2022 and the current expiration date is May 31, 2025.

ORR is proposing revisions to one form in this collection, the *Authorization for Release of Records* (Form A-5).

## **OVERVIEW OF REQUESTED CHANGES**

ORR proposes the following revisions for Form A-5:

- Replace the “UC” acronym with “unaccompanied child” or “child” when referring to a child throughout the form.
- Make the following revisions to align with a recently submitted non-substantive change request for the *Notice of Attorney Representation* (Form L-3A, currently approved under OMB# 0970-0565). The change request created an alternate version of the form, the *Notice of Legal Service Provider Screening* (Form L-3B), to be used by legal service providers when requesting additional case file records to complete ORR-contracted legal screening.
  - Add an option for “Completing an ORR-contracted legal screening” to Section B: Reason for Request.
  - Replace reference to Board of Immigration Appeals (BIA) with U.S. Department of Justice (DOJ) Add an option for *Notice of Legal Service Provider Screening* to

Section F: Supporting Documentation.

- Add *Notice of Legal Service Provider Screening* as an example of documents that fall under the Legal Information record category in the instructions for Section E.
- Change the supporting documentation requirement for ORR-funded legal service providers from the *Notice of Attorney Representation* to the *Notice of Legal Service Provider Screening* in the table found in the instructions for Section F.
- Remove references to two discontinued forms in the instructions for Section E (the *Post Legal Status Plan* and the *30-Day Restrictive Placemen Case Review*).
- Revise the wording in the supporting documents table in the instructions for Section F to match the wording in [UC Policy Guide Section 5.10.1.1](#).
- Revise the instructions for Section G to align with [UC Policy Guide Section 5.10.1.2](#), which allows ORR discretion to allow release of a photograph of a child to a government agency without an authorizing signature. Photographs may only be provided without the child's consent when the child's consent cannot be obtained and it is understood that the provision of the photograph is not for immigration enforcement purposes, ORR determines that provision of the photograph is in the child's best interest, and there is a legitimate child welfare reason for the photograph to be provided, such as for a case where a child has been reported missing. Limitations on sharing a child's photograph with DHS or EOIR are subject to the restrictions outlined in [UC Policy Guide Section 5.10.2](#).